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**UNITED STATES DISTRICT COURT**

## **NORTHERN DISTRICT OF CALIFORNIA**

BRETT MCNAMAR, individually, and  
on behalf of those similarly situated,

Plaintiff,

VS.

## EXPERIAN INFORMATION SOLUTIONS, INC.,

Defendant.

Case No. 4:25-CV-04819-HSG

**JOINT STIPULATION TO EXTEND  
MOTION TO DISMISS BRIEFING  
DEADLINES; ORDER (as modified)**

1 Pursuant to Fed. R. Civ. P. 6(b) and Civil L.R. 6-2, this Stipulation is entered into between  
 2 Plaintiff Brett McNamar (“Plaintiff”) and Defendant Experian Information Solutions, Inc. (“Experian”),  
 3 by and through their respective counsel of record.

4 On November 21, 2025, Experian responded to the Court’s Order to Show Cause by, among  
 5 other things, stating that it would move to dismiss the second amended complaint. *See* ECF No. 54. The  
 6 OSC response stated that the parties had conferred regarding the briefing deadlines and stipulated to the  
 7 following schedule:

- 8 1) Experian’s motion to dismiss shall be filed no later than December 5, 2025;
- 9 2) Plaintiff’s opposition to Experian’s motion to dismiss shall be filed no later than  
 December 23, 2025;
- 11 3) Experian’s reply in support of its motion to dismiss shall be filed no later than  
 January 9, 2026;
- 13 4) Experian’s motion to dismiss shall be set for hearing on January 26, 2026 at 2 p.m.  
 14 PST.

15 ECF No. 54. On November 24, 2025, the Court ordered Experian to respond to the Complaint no later  
 16 than December 5, 2025. *See* ECF No. 55. Experian did so, Experian filing its Notice of Motion and  
 17 Motion to Dismiss Second Amended Complaint Pursuant to 12(B)(1) and 12(B)(6) on December 5,  
 18 2025. *See* ECF No. 56, 57. Experian noticed the motion to be heard on January 26, 2026 pursuant to  
 19 the parties’ stipulation.

20 Upon filing, the Court docket reflected the deadlines under Civil LR. 7-3, setting Plaintiff’s  
 21 opposition is due December 19, 2025, and Experian’s reply is due December 26, 2025;

22 Pursuant to their prior stipulation, *see* ECF No. 54, the parties agree to the following briefing  
 23 extensions related to this motion to dismiss, which provides a 4-day extension for Plaintiff’s Opposition,  
 24 and a 14-day extension for Defendant’s Reply:

| Event                  | Proposed Date     |
|------------------------|-------------------|
| Plaintiff’s Opposition | December 23, 2025 |
| Experian’s Reply       | January 9, 2026   |

1 The parties also request that the motion be heard on January 26, 2026. The requested change in the  
 2 briefing deadlines is sought in good faith and not for the purposes of delay or any other improper  
 3 reason, and will not alter the date of the hearing on the motion to dismiss in this matter. Good cause  
 4 exists for altering the default briefing schedule and adopting the parties' proposed deadlines due to  
 5 counsel's other case obligations and the holiday period.

6 Although this extension in and of itself does not impact the current schedule for this case, we  
 7 note that the current schedule was entered for this case prior to Defendant's Motion to Dismiss.

8  
 9 IT IS SO STIPULATED.

10 Dated: December 10, 2025

Respectfully submitted,

11 **ZIMMERMAN REED LLP**

12 */s/ Behdad C. Sadeghi*  
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 10 *Attorneys for Defendant Experian Information Solutions,  
 11 Inc.*

12 **SIGNATURE ATTESTATION**

13 Pursuant to Civil Local Rule 5-1(i)(3), the filer of this document attests that all signatories  
 14 concur in the filing of this Joint Stipulation to Extend Motion to Dismiss Briefing Deadlines.

15 Dated: December 10, 2025 By: /s/ Behdad C. Sadeghi  
 16 Behdad C. Sadeghi

17 **ORDER**

18 Pursuant to the parties' stipulation under Civil L.R. 6-2, and for good cause under Fed. R. Civ.  
 19 P. 6(b), IT IS HEREBY ORDERED that the following briefing deadlines shall be in effect related to  
 20 Defendant's December 5 Notice of Motion and Motion to Dismiss Second Amended Complaint  
 21 Pursuant to 12(B)(1) and 12(B)(6) [DKT 56]:

| Event                  | Proposed Date     |
|------------------------|-------------------|
| Plaintiff's Opposition | December 23, 2025 |
| Experian's Reply       | January 9, 2026   |

22 PURSUANT TO STIPULATION, IT IS SO ORDERED. The hearing on the motion will  
 23 be held on January 29, 2026 at 2 p.m., in courtroom 2, 4th in Oakland, CA.

24 Dated: 12/10/2025

25  
 26   
 27 HONORABLE HAYWOOD S. GILLIAM, JR.  
 28 United States District Court Judge